

Watwood
and
Heavener,
inc.

Consulting Engineers • Architects

James E. Watwood, President
Robert F. Heavener, Vice President
Darlene Pettygrove, Secretary

November 21, 1983

U. S. Environmental Protection Agency
Regional Administrator
Region V
230 South Dearborn Street
Chicago, IL 60604

RECEIVED
DEC 02 1983
ILL. E.P.A. - D.L.P.C.
STATE OF ILLINOIS

Re: Rockwell International
Centralia, Illinois
Hazardous Waste Storage Site Closure
USEPA I.D. No. ILD064626344

W&H Job No. 831480

Gentlemen:

On November 21, 1983, I visited the hazardous waste storage site at the Rockwell International plant in Centralia, Illinois; Rockwell's closure plan (amended date, June 30, 1983) was reviewed following this inspection. In accordance with the requirements of 40 CFR, Subpart G, 265.115, I, hereby, certify that the Rockwell hazardous waste storage site has been closed in conformance with its closure plan.

Very truly yours,

WATWOOD AND HEAVENER, INC.

William D. Rose

William D. Rose, P. E.
(Illinois P.E. No. 62-33102)

WDR/dp

Rockwell co-certification:

John J. Sullivan
(signature)

11/21/83
(Date)

John J. Sullivan, Plant Manager
(Name and Title)

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FEB 13 1984

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NOV 28 1983

WASTE MANAGEMENT
BRANCH

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

KM
DS 12/8

Plastics Division
4002 Industrial Park
P.O. Box 588
Centralia, IL 62801

(618) 532-1871



Rockwell
International

June 30, 1983

Mr. Lawrence W. Eastep, P.E. Manager
Permit Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

RECEIVED
JUL 05 1983
WASTE MANAGEMENT BRANCH
EPA, REGION V

RE: Closure Plan for Closure of Storage Facility at
Rockwell International Plastics Division, Centralia,
Illinois 62801, U.S. E.P.A. I.D. No. ILD064626344 PA, G, TSD, PASI
Illinois Generator No. 1214220002

SUBJECT: REQUEST FOR CHANGE OF SCHEDULE FOR CLOSURE

Dear Mr. Eastep,

Since our original application for closure of our storage facility, we have not received the necessary disposal permits for some of our waste streams. We currently are holding less than 100 drums of hazardous waste in our storage area that we do not have disposal permits for. Permits have been applied for in all cases. Therefore we feel it is necessary at this time to request additional time to complete closure of our facility.

Attached is a copy of our original Closure Plan as we submitted on April 15, 1983, and was subsequently approved on May 13, 1983. The attached plan contains a revised Item IV. "Schedule for Closure" for your consideration.

The additional time requested will be used to locate an alternate approved disposal facility and obtain the necessary disposal permits.

Sincerely,


John J. Sullivan
Plant Manager

JJS/mh

cc: George Levy - Troy
Phil Backlund - Troy
Valdas Adamkus - EPA Region 5 Regional Adm- Chicago, IL
Bill Miner - RCRA Activities - Chicago, IL

Attachment

RECEIVED
7/05/83

Plastics Division
Rockwell International Corporation
4002 Industrial Park
Route 5, Box 151
Centralia Illinois 62801

(618) 532-1871



**Rockwell
International**

FUNCTION: Plant Engineering

NO: FY-82 PL E. 1032

PREPARED BY:

APPROVED BY:

Revision #1 5/10/82

Revision #2 4/13/83

Revision #3 6/30/83

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN

In order for Rockwell, Centralia Plastics to be in compliance with E.P.A. Resource Conservation and Recovery Act, it is necessary to establish a written closure plan for the hazardous waste storage site.

TABLE OF CONTENTS TO CLOSURE PLAN

- I. Step-By-Step Procedure to Partially or Completely Close the Storage Facility
 - IA. Closure Performance
- II. Maximum inventory of Hazardous Waste in Storage during the life of the Storage Facility.
- III. Inventory Removal, Disposal and Decontamination of Equipment.
- IIIA. Closure of Containers
- IV. Schedule for Closure
- V. Cost Estimate to Close the Storage Facility
- VI. Special Instructions

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL CENTRALIA, ILLINOIS

I. Step-by-step procedure to partially or completely close the storage facility.

NOTE: As of this date, the management of Rockwell International, Plastics Division, Centralia, Illinois has no intention of partially closing the hazardous waste storage facility. Therefore, the contents of this plan will be for complete closure only.

1. Submit the closure plan to the Regional Administrator at least 180 days before closure is expected to begin.

U. S. Environmental Protection Agency
Regional Administrator
Region V
230 South Dearborn Street
Chicago, IL 60604

2. Immediately after the decision is made to close the facility, a final inventory will be taken of each type of hazardous waste in storage. This inventory will then be used to double check to make certain that all applicable disposal permits are current.
3. Call and follow up in writing, a request to each disposal site and/or transporter listed on each individual disposal permit to have the inventoried waste picked up and disposed.
4. Depending on the response received from authorized transporters and disposal sites, a written schedule should be prepared for shipping of all hazardous wastes. All applicable and current regulations on packaging, labeling, shipping (manifests) will be followed.
5. After all hazardous waste drums have been removed, an independent registered professional engineer and the Plant Manager must execute a certification that the storage site has been closed in accordance with the approved plan. This certification must be submitted to the U.S.E.P.A. Region V Administrator (see #1 above for address).

HAZ. JOUS WASTE STORAGE SITE CL URE PLAN

ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

1A. CLOSURE PERFORMANCE STANDARD

The closure of the storage facility which is now scheduled to be complete by Aug. 31, 1983 will be accomplished by shipping all waste strams that have been stored for more than ninety days. All drums will be shipped by a licensed Hazardous Waste Hauler to a licensed Hazardous Waste Disposal Facility. All waste which is stored in proper D.O.T. containers will be loaded with the usual caution excercised in handling hazardous waste. Should a drum be ruptured or spill during the loading process all materials shall be cleaned up in the following manner.

- a - Spills on concrete or hard non-absorbant surfaces:
The spill area shall be covered immediately with "Oil sorb" from the Maintenance Department. All materials shall then be scooped and swept up and deposited into D.O.T. approved drums, sealed and labeled. The material shall then be disposed of as Hazardous Waste.
- b - Spills on soil, gravel or other outdoor absorbant surfaces:
The spill area shall be covered immediately with "Oil Sorb" from the Maintenance Department. The area shall be dug up extending a minimum of 1 foot around the spill and 1 foot deep. All material dug up shall be deposited into D.O.T. approved drums, sealed and labeled. The material shall then be disposed of as hazardous waste.

By following the above procedures, there will be no need for further maintenance and controls which eliminates threats to human health and the environment, and avoids post - closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to ground or surface waters or to the atmosphere.

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

II. Maximum inventory of Hazardous Waste in Storage during the life of the Storage Facility.

Waste Type	No. 55 Gallon Drums
Waste Hydraulic Oil & Pit Sludge	43
Waste Paint	93
Waste M.E.K. Flush	334
Waste Methylene Chloride & Bond	90
Waste Methylene Chloride & Ren	<u>178</u>
Total Drums	738 *

*Inventory In September, 1982

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

III. Inventory Removal, Disposal and Decontamination of Equipment:

The hazardous waste storage facility at Centralia is for 55 gallon drums only. Therefore if a spill occurs it will be immediately evident and require immediate attention as described in Section 1A of this closure plan. Labor used in Decontamination, should it become necessary, will be provided by Rockwell Personnel. Tools needed for decontamination will be normal hand tools used at our plant. They will be typically shovels, scrapers, oil - sorb (an absorbant material, and brooms). If the spill should be flammable material, the tools shall be non-sparking special tools. After the spill has been cleaned up the tools shall be wiped down with clean rags. The rags will then be disposed of as hazardous waste. When soil, gravel or other absorbant substance is to be removed a hole will be dug a minimum of one foot, in all directions, larger than the spill. The hole shall be a minimum of one foot deep. All soil removed shall be placed in D.O.T. approved drums and disposed of as hazardous waste. Decontamination of soil and tools shall be determined to be complete upon the visual inspection of Rockwell's Safety and Security Manager.

All material will be shipped by truck approximately 300 miles to a secure landfill. Reclaimable M.E.K. will be shipped by truck approximately 100 miles to a licensed treatment facility.

The following Illinois E.P.A disposal permits are current and usable. 821749, 822030, 822031, 822032, 822212 and 991148.

The following hazardous wastes have been analyzed and applications for permits have been submitted.

- 1 - Waste obsolete and outdated Sherwin Williams and Siebert Oxidermo Paint.
- 2 - Waste obsolete and outdated 3-M Rubber adhesive.
- 3 - Waste General Tire and Sherwin Williams In-mold Coating material with Reclaimable Methylene Chloride.
- 4 - Waste obsolete and outdated General Tire and SHERWIN Williams In-mold Coating material.
- 5 - Waste Dilute Hydrochloric Acid
- 6 - Waste Karl Fisher Agent

IIIA. CLOSURE OF CONTAINERS

All containers (55 gallon drums) of Hazardous Waste shall be transported from the outside storage area to the loading dock by forklift trucks. They shall then be loaded on a licensed haulers truck for transport to a secure landfill. All wastes are contained in D.O.T. approved containers (see procedure FY-80-PL. E. 1022 attached) therefore, the forklift operators will not be exposed to the waste. Should a container be damaged in handling and leak the procedure in Sections IA and III of this closure plan shall be followed.

FUNCTION: PLANT ENGINEERING

NO: FY 80 PL. E. 1022

PREPARED BY:

APPROVED BY:

HAZARDOUS OR SPECIAL WASTE PACKAGING PROCEDURE

I. In order for Rockwell to be in compliance with EPA, RCRA and DOT regulations, new procedures in packaging and handling of hazardous and special wastes must be followed immediately.

A. Packaging of Materials in Removable Head Containers. Removeable head drums should only be used for hazardous waste when closed head drums cannot be used.

SAFETY NOTE: Do not used spark producing tools when packaging waste paint or MEK or when working with empty paint or MEK drums.

1. DRUM INSPECTION

- (a) The drum must be one in which a material was shipped to Rockwell, emptied, and is being refilled for the first time. This is important! Drums that have been re-used are not authorized. The only exceptions to this are in (b) and (c) below.
- (b) 55 gal. steel drums that are new are authorized.
- (c) 55 gal. steel drums that have been reconditioned and tested are authorized.
- (d) Inspect the drum bottom for the embossed lettering DOT-17C STC or DOT-17HSTC. Drums otherwise marked or unmarked are not authorized.
- (e) Inspect the drum for leaks, dents or other deterioration. Remove dents to bring the drum back to its original contour. All other defect are not authorized.
- (f) All marking, including name of previous contents, addressed, and labels must be removed or painted over so that they cannot be read. Including marking on the removable head.

2. FILLING

- (a) After all of the above have been completed the drum may be filled. All drums are to have a minimum of 2" air space to allow for expansion of the waste material.

3. SEALING

- (a) Inspect the lid for straightness and boe. Lids that have been crowned in excess of 3/8" are not authorized. Any visible damage in the seal area is not authorized.

- (b) Fit the lid with a new gasket and carefully align it on top of the drum.
- (c) Inspect the closure ring. Closure rings are to be of 12 ga. steel and be free of twist, dents, or any other defect that could allow the drum to leak.
- (d) Fit the closure ring over the top carefully, bolt lugs down, without disturbing the gasket.
- (e) Fasten the closure ring with a 5/8" minimum dia. bolt and nut.
- (f) Inspect all other plugs and closures for tightness and good gaskets. All plugs and caps must be metal (18 ga. min.)

4. MARKING

- (a) Make up the appropriate hazardous waste label and secure it to the side of the drum approximately 1" from the top.
- (b) Secure a "flammable liquid" label next to the hazardous waste label if required.
- (c) Transport the filled drum to the hazardous waste storage area.

B. Packaging of Material in Non-Removable Head Containers.

SAFETY NOTE: Do not use spark producing tools when packaging Waste paint or MEK or when working with empty paint or MEK drums.

1. DRUM INSPECTION

- (a) Drum inspection is the same as for removable head drums with the exception of item (d). The bottom for non-removable head drums should be embossed with DOT-17E STC. Drums otherwise marked or unmarked are not authorized.

2. FILLING

- (a) Same as for removable head drums.

3. Sealing

- (a) Inspect all plugs for good gaskets and tightness. All plugs must be metal (18 ga. min.)

4. MARKING

- (b) Same as for removable head drums.

IV. SCHEDULE FOR CLOSURE

(Revised 6/30/83)

<u>EVENT</u>	<u>ESTIMATED COMPLETION DATE</u>
1. Submit closure to E.P.A. Regional Administrator	Feb. 15, 1983 (Actual Date)
2. Re-submit closure plan *	April 15, 1983
2A Request change in schedule for closure	June 30, 1983
3. Receive permits on all waste streams from Illinois E.P.A.	
4. All hazardous waste stored in excess of 90 days removed from storage site.	Oct. 31, 1983
NOTE: Rockwell International Centralia, Illinois will continue to be a hazardous waste generator and store hazardous waste. However, all hazardous waste will be shipped and disposed of according to all State and Federal E.P.A., R.C.R.A. and D.O.T. regulations within 90 days after they are generated.	
5. Submit certification of closure August 31, 1983, completion to E.P.A. Regional Administrator.	Nov. 30, 1983

*Original closure plan rejected by Illinois E.P.A. on April 6, 1983. (See letter attached)

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

V. COST ESTIMATE TO CLOSE STORAGE FACILITY

Cost Estimate Date: April 13, 1982

A.	Transportation & Disposal Cost = 738 Drums @ \$49.63/Drum	\$36,626.94
B.	Labor to Load = 3 Man Hours/Truck x 10 Trucks = 30 Man Hours @ \$28.00/Hour	840.00
C.	Salary Cost to Administer Closure 2 Hrs./Shipment x 10 Shipments x \$35.00/Hr.	700.00
D.	Decontamination of Area 100 Man Hours @ \$28.00/Hour	2,800.00*
F.	Professional Engineering Fee to Certify Closure	1,200.00
G.	Contingency Items:	3,000.00
	a. Extra Drums	
	b. Clean-up Materials	
	c. Labels	
	d. Miscellaneous Supplies	
	TOTAL ESTIMATED CLOSURE COST	<u>\$45,166.94</u>

*ONLY IF A SPILL OCCURS

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

VI. Special Instructions

- A. This plan must be kept on file at the plant at all times.
- B. This plan must be amended within 60 days after any change is made in waste management operations that affect the terms of the closure plan.
- C. This plan must be furnished to EPA upon request and made available for on-site inspections.
- D. This plan must be submitted within 15 days to the Regional Administrator if our facility has its interim status terminated or an administrative or judicial order directing that we cease operation is received.
- E. The closure cost estimate contained in this plan must be adjusted for inflation annually beginning May 19, 1982.



217/782-6762

Refer to: 12180211 -- Marion County
Centralia/Rockwell International
ILD064626344

May 13, 1983

John J. Sullivan, Plant Manager
Rockwell International Plastics Division
4002 Industrial Park
P.O. Box 588
Centralia, Illinois 62801

Dear Mr. Sullivan:

The closure plans submitted by Rockwell International Plastics Division, and prepared by Richard Lovett, Project Engineer, dated April 15, 1983, and received by this Agency on April 20, 1983, to close the hazardous waste storage area is hereby approved. The approval of these plans is further subject to the following modifications and conditions:

1. Certification of Closure: When closure is complete the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.
2. All residues, spills, and hazardous wastes, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products must be controlled, minimized, or eliminated, to the extent necessary to protect human health and the environment, from escaping to the ground or surface waters or to the atmosphere.

RECEIVED
MAY 20 1983

WASTE MANAGEMENT
BRANCH




Page 2

All certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706

Very truly yours,


Lawrence H. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:PMM:rd7139C/14-15

RL
cc: Southern Region
USEPA -- Region V
Richard Lovett, Project Engineer

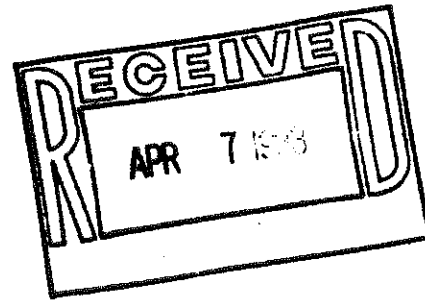


217/782-6762

Refer to: 12180211 -- Marion County
Centralia/Rockwell International
ILD 064626344

April 6, 1983

John J. Sullivan
Plant Manager
Plastics Division
Rockwell International Corporation
4002 Industrial Park
Route 5, Box 151
Centralia, Illinois 62801



Dear Mr. Sullivan:

The closure plan prepared by Richard Lovett, Project Engineer, dated May 10, 1981, and submitted by Rockwell International on February 15, 1983 and received by the Illinois EPA on February 18, 1983 has been reviewed.

Due to the attached deficiencies, the plan is rejected.

Following the procedures in Section 725.212(d) of the Interim Standards of the Illinois Admin. Code, the owner or operator of Rockwell International Corporation must modify the original closure plan or submit a new plan for approval within 30 days. The EPA Director will approve or modify this plan in writing within 60 days. If the Director modifies the plan, this modified plan will become the approved closure plan. The Director's decision will assure that the approved closure plan is consistent with Interim Standards. A copy of the modified plan will be mailed to the owner or operator.

Should you have any questions regarding this, please contact Pat Murphy at 217/782-9798.

Very truly yours,

Rama K. Chaturvedi, P.E., Manager
RCRA Unit
Permit Section
Division of Land Pollution Control

RKC:PMM:rd6776C/15

Attachment

cc: Rockford Region



List of Deficiencies

1. Closure Performance Standard (40 CFR Section 264.111) (35 Ill. Admin. Code 725.211)

Describe how the facility will be closed in a manner that minimizes the need for further maintenance and controls, minimizes, or eliminates threats to human health and the environment; and avoids post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to ground or surface waters or to the atmosphere.

2. Maximum Waste Inventory (40 CFR Section 264.112(a)(2)) (35 Ill. Admin. Code 725.212(a)(2))

The maximum inventory of wastes in storage at any time during the life of the facility must be provided. The closure cost estimate must be based on that maximum inventory. Indicate on the Closure Plan that these are estimates of maximum inventory or provide this information and revise the closure cost estimate.

3. Inventory Removal, Disposal, or Decontamination of Equipment (40 CFR Section 264.112(a)(3)) (35 Ill. Admin. Code 725.21(a)(3))

The following statement:

"There will be no decontamination of equipment involved in the closure of the facility unless a drum is ruptured or leaking."

is not acceptable. Contamination from current events, as well as past events, could contaminate the equipment used for closure.

Describe the steps needed to decontaminate facility equipment during final closure (should decontamination become necessary), the labor force you intend to use to perform decontamination (in-house or outside contractor), and your criteria for determining contamination. Name each piece of equipment and/or structures including equipment used to remove contaminated material, and procedures for cleaning (e.g., steam-cleaning, hydroblasting). Describe the amounts of contaminated soil to be disposed of on and off the site, and describe the criteria used to determine the amount of contaminated soil. Describe the method for processing, treating, or disposing of residues from decontamination (including decontaminant solutions, wastewater, and liquid wastes). Describe the testing program to be used to determine if decontamination has been effective for each piece of equipment and/or structure and surrounding soils (e.g., laboratory procedures, kits, mechanical, electrical, or visual methods). Describe the method of transport to the disposal site (e.g., truck, rail, water), the distance of transport to the disposal site, and the final disposal method (e.g., facility type such as a secure landfill). Indicate that all applicable disposal permits are current and usable.



4. Closure of Containers (40 CFR Section 264.178)

Describe in detail how, at closure, all hazardous wastes and hazardous waste residues will be removed from the container storage area, and how containers and the containment system will be removed or decontaminated. Describe safety precautions and procedures to protect the labor force during the operation. Show how the effectiveness of decontamination will be determined. Also describe the fate of all removed hazardous waste and waste residues and how containers, containment linings, contaminated solids, and decontamination washes will be handled and disposed of.

5. Schedule for Closure (40 CFR Section 264.112(a)(4)) (30 Ill. Admin. Code 725.212(a)(4))

Provide an estimate of the expected date of closure. The date provided, May 19, 2001, does not agree with the information in the cover letter from John J. Sullivan to Bill Miner. The estimated date of closure may be set as the date of approval of the closure plans or a certain number of days after the approval, etc. The closure schedule must include the total time required to close the facility and a milestone schedule depicting the time required for intervening closure activities. This will allow tracking of the progress of closure. Include provisions in the plan for scheduling several periodic inspections during the closure period.

The milestone schedule should show that all hazardous wastes will be treated, removed from the site, or disposed of on the site within 90 days of receipt of the final volume of waste and that all closure activities will be completed within 180 days from receipt of the final volume of waste.

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

VI. Special Instructions

- A. This plan must be kept on file at the plant at all times.
- B. This plan must be amended within 60 days after any change is made in waste management operations that affect the terms of the closure plan.
- C. This plan must be furnished to EPA upon request and made available for on-site inspections.
- D. This plan must be submitted within 15 days to the Regional Administrator if our facility has its interim status terminated or an administrative or judicial order directing that we cease operation is received.
- E. The closure cost estimate contained in this plan must be adjusted for inflation annually beginning May 19, 1982.

ICD 064626344

5HW ¹³~~108~~

MAR 3 1983

Thomas Cavanagh, Manager
Permits Section, DLPC
Illinois EPA
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Cavanagh:

I am herewith transferring the items listed below for your Agency for processing in accordance with the Phase I interim authorization agreement.

Closure plan dated May 10, 1982, for Rockwell International--Plastics Division, Centralia, Illinois.

Your efforts on these matters are appreciated. Please contact Mr. Robert Stone of my staff, at (312) 886-6151, if you need more information.

Sincerely,

William H. Miner, Chief
Technical, Permits, and Compliance Section

Enclosure
bcc: Part A file for each item
Chuck Lewis, GMCU
Bob Stone, SIO

5HW-13:R.STONE:ad 2/28/83 Disk #10 Line 43



Handwritten: PCH 2-28-83

Handwritten: JGW 3/1/83

Handwritten: Done 3/1/83



Plastics Division
Rockwell International Corporation
4002 Industrial Park
Route 5, Box 151
Centralia Illinois 62801

(618) 532-1871



Rockwell
International

*Duplicate
Copy
Original sent
to SE Pa by B. Stone*

February 15, 1983

RECEIVED
FEB 23 1983

**WASTE MANAGEMENT
BRANCH**

Mr. Bill Miner
RCRA Activities
Part B Permit Application
U.S.E.P.A. Region V
P.O. Box A 3587
Chicago, IL 60690-3587

SUBJECT: CLOSURE OF STORAGE FACILITY AT
ROCKWELL INTERNATIONAL PLASTICS DIVISION
CENTRALIA, IL 62801
ILD 064626344 *PA, G, TSD, PAS 1*


Dear Mr. Miner:

As Richard Lovett discussed with you on the phone, within 90 days we will no longer require a storage permit at our facility. We will however, continue to be a generator of Hazardous Waste. Therefore, we will not be submitting a Part B application for a final storage permit.

I am enclosing a copy of our closure plan in accordance with 40CFR 265.112.

Also enclosing is a certificate authorizing me to sign on behalf of Rockwell International.

Sincerely Yours,


John J. Sullivan
Plant Manager

m/

cc: Valdas Adamkus
EPA Region 5 Regional Adm.
230 S. Dearborn St
14th Floor
Chicago, IL 60604

Robert Kuykendall
Illinois EPA
2200 Churchill Road
Springfield, IL 62706

George Levy (Troy - 292-AU01)
Phil Backlund (Troy - 292 AU01)

Enclosure

RECEIVED
2/24/83

Plastics Division
Rockwell International Corporation
4002 Industrial Park
P.O. Box 588
Centralia, Illinois 62801

(618) 532-1871



Rockwell
International

LOCATION: Plant Engineering

NO.: FY-82 PL.E. 1032

PREPARED BY

APPROVED

Revision #1 5/10/82

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN

In order for Rockwell, Centralia Plastics to be in compliance with E.P.A. Resource Conservation and Recovery Act, it is necessary to establish a written closure plan for the hazardous waste storage site.

TABLE OF CONTENTS TO CLOSURE PLAN

- I. Step-By-Step Procedure to Partially or Completely Close the Storage Facility
- II. Estimate of Inventory of Hazardous Waste at Time of Closure
- III. Decontamination of Equipment During Closure
- IV. Schedule for Closure
- V. Cost Estimate to Close the Storage Facility
- VI. Special Instructions

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL CENTRALIA, ILLINOIS

I. Step-by-step procedure to partially or completely close the storage facility.

NOTE: As of this date, the management of Rockwell International, Plastics Division, Centralia, Illinois has no intention of partially closing the hazardous waste storage facility. Therefore, the contents of this plan will be for complete closure only.

1. Submit the closure plan to the Regional Administrator at least 180 days before closure is expected to begin.

U. S. Environmental Protection Agency
Regional Administrator
Region V
230 South Dearborn Street
Chicago, IL 60604

2. Immediately after the decision is made to close the facility, a final inventory will be taken of each type of hazardous waste in storage. This inventory will then be used to double check to make certain that all applicable disposal permits are current.
3. Call and follow up in writing, a request to each disposal site and/or transporter listed on each individual disposal permit to have the inventoried waste picked up and disposed.
4. Depending on the response received from authorized transporters and disposal sites, a written schedule should be prepared for shipping of all hazardous wastes. All applicable and current regulations on packaging, labeling, shipping (manifests) will be followed.
5. After all hazardous waste drums have been removed, an independent registered professional engineer and the Plant Manager must execute a certification that the storage site has been closed in accordance with the approved plan. This certification must be submitted to the U.S.E.P.A. Region V Administrator (see #1 above for address).

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

II. Estimate of Inventory of Hazardous Waste at Time of Closure

Waste Type	No. 55-Gallon Drums
Waste Hydraulic Oil and Pit Sludge	40
Waste Paint	20
Waste MEK Flush	450
Waste Methylene Chloride and Bond	60
Waste Methylene Chloride and Ren	60
	<hr/>
Estimated Total Drums at Closure	630
	<hr/>

Date of Estimate: May 19, 1981

Revision Dates

Reviewed May 10, 1982 No Change

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

III. Decontamination of Equipment

The hazardous waste storage facility at Centralia is for 55-gallon drums only. Therefore, there will be no decontamination of equipment involved in the closure of the facility unless a drum is ruptured or is leaking. If a drum is spilled in the process of closure, the contents will be cleaned up using an absorbent material. The absorbent material containing the waste will then be placed in a sealed drum and disposed of as hazardous waste.

After all drums of hazardous waste have been removed from the storage area, the entire area will be examined for spilled material. In the event that spilled material is found, the contaminated gravel and/or soil will be removed and disposed of as hazardous waste.

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

IV. Schedule for Closure

- NOTES: A - The life expectancy of the hazardous waste storage site at Centralia is 20 years beginning on May 19, 1981. That fixes the expected closure date at May 19, 2001.
- B - Disposal of all hazardous waste must be complete within 90 days after closure begins.
- C - Closure must be complete within six (6) months after the last drum of hazardous waste is placed in the storage area.

<u>SCHEDULE</u>	
<u>EVENT</u>	<u>DAYS TO COMPLETE</u>
1. Decision to close storage site	-
2. Submit closure plan to EPA Regional Administrator	5
3. Schedule permitted transporters and disposal sites	180
4. Remove all hazardous waste from site	60
5. Decontaminate area	15
6. Submit certification of closure to EPA Regional Administrator	15
	<hr/>
Total calendar days from decision to close until completion of closure	275
	<hr/> <hr/>

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN

Rockwell International - Centralia, Illinois

V. Cost Estimate to Close Storage Facility

Cost Estimate Date: May 10, 1982

A.	Disposal Cost = 630 Drums @ \$51.50/Drum	\$ 32,447.00
B.	Transportation Cost = 630 Drums ÷ 63 Drums/ Truck X \$845.00/Load	8,447.50
C.	Labor to Load = 5 Man Hours/Truck X 10 Trucks = 50 Man Hours @ \$27.25/Hour	1,362.50
D.	Salary Cost to Administer Closure 125 Days @ \$163.50/Day	20,437.50
E.	Decontamination of Area Backhoe and Operator for 40 Man Hours @ \$54.50/Hour	2,180.00
F.	Professional Engineering Fee to Certify Closure	1,090.00
G.	Contingency Items:	2,725.00
	a. Extra Drums	
	b. Clean-up Materials	
	c. Labels	
	d. Miscellaneous Supplies	
	TOTAL ESTIMATED CLOSURE COST	<u>\$ 68,689.50</u>

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

VI. Special Instructions

- A. This plan must be kept on file at the plant at all times.
- B. This plan must be amended within 60 days after any change is made in waste management operations that affect the terms of the closure plan.
- C. This plan must be furnished to EPA upon request and made available for on-site inspections.
- D. This plan must be submitted within 15 days to the Regional Administrator if our facility has its interim status terminated or an administrative or judicial order directing that we cease operation is received.
- E. The closure cost estimate contained in this plan must be adjusted for inflation annually beginning May 19, 1982.

CERTIFICATE

I, ARNOLD W. CANFIELD, certify that I am Assistant Secretary of Rockwell International Corporation, a Delaware corporation, and further certify that:

1. John J. Sullivan is a duly appointed and authorized Plant Manager of the Plastics Division, Automotive Operations, Rockwell International Corporation, Centralia, Illinois, and as such, is fully authorized to execute and deliver on behalf of the corporation agreements and permit applications in the ordinary course of business constituting legally binding obligations of the corporation; and

2. John J. Sullivan as Plant Manager of the Plastics Division at Centralia, Illinois, has duly executed and delivered on behalf of the corporation the Operating Permit Applications to the State of Illinois, Environmental Protection Agency, Division of Air Pollution Control and is authorized, within the approval limits set forth in the Policy and Procedure of Rockwell International Corporation, to cause or to allow the construction, modification and operation of the equipment to be covered by the permit.

3. The foregoing is hereby certified to be in full force and effect as of the date hereof.

[CORPORATE SEAL]


Assistant Secretary

Dated: May 21, 1979

Plastics Division
4002 Industrial Park
P.O. Box 588
Centralia, IL 62801

(618) 532-1871



Rockwell
International

April 15, 1983

Mr. Rama K. Chaturvedi
RCRA Unit
Permit Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62706

RECEIVED
APR 22 1983
WASTE MANAGEMENT BRANCH
EPA, REGION V

Subject: REVISED CLOSURE PLAN FOR CLOSURE OF STORAGE
FACILITY AT ROCKWELL INTERNATIONAL PLASTICS
DIVISION, CENTRALIA, ILLINOIS 62801
ILD064626344 PA, G, TSD, PASI

Dear Mr. Chaturvedi,

Enclosed is a copy of our revised Closure Plan as you requested in your letter of April 6, 1983.

I would like to stress again that our facility will continue to be a generator of hazardous waste. We will continue our operation as we have in the past with the exception that we will not store our waste over 90 days.

Sincerely Yours,


John J. Sullivan
Plant Manager

JJS:mh

cc: George Levy (Troy - 292-AU01)
Phil Backlund (Troy - 292-AU01)

Valdas Adamkus
EPA Region 5 Regional Adm.
230 S. Dearbon St.
14th Floor
Chicago, IL 60604

Mr. Bill Miner
RCRA Activities
Part B Permit Application
U.S.E.P.A. Region V
P.O. Box A 3587
Chicago, IL 60690-3587

RECEIVED
4/22/83

Plastics Division
Rockwell International Corporation
4002 Industrial Park
Route 5, Box 151
Centralia Illinois 62801

(618) 532-1871



Rockwell
International

FUNCTION: Plant Engineering

NO: FY-82 PL. E. 1032

PREPARED BY:

APPROVED BY:

Revision #1 5/10/82

Revision #2 4/13/83

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN

In order for Rockwell, Centralia Plastics to be in compliance with E.P.A. Resource Conservation and Recovery Act, it is necessary to establish a written closure plan for the hazardous waste storage site.

TABLE OF CONTENTS TO CLOSURE PLAN

- I. Step-By-Step Procedure to Partially or Completely Close the Storage Facility
 - IA. Closure Performance
- II. Maximum inventory of Hazardous Waste in Storage during the life of the Storage Facility.
- III. Inventory Removal, Disposal and Decontamination of Equipment.
- IIIA. Closure of Containers
- IV. Schedule for Closure
- V. Cost Estimate to Close the Storage Facility
- VI. Special Instructions

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL CENTRALIA, ILLINOIS

I. Step-by-step procedure to partially or completely close the storage facility.

NOTE: As of this date, the management of Rockwell International, Plastics Division, Centralia, Illinois has no intention of partially closing the hazardous waste storage facility. Therefore, the contents of this plan will be for complete closure only.

1. Submit the closure plan to the Regional Administrator at least 180 days before closure is expected to begin.

U. S. Environmental Protection Agency
Regional Administrator
Region V
230 South Dearborn Street
Chicago, IL 60604

2. Immediately after the decision is made to close the facility, a final inventory will be taken of each type of hazardous waste in storage. This inventory will then be used to double check to make certain that all applicable disposal permits are current.
3. Call and follow up in writing, a request to each disposal site and/or transporter listed on each individual disposal permit to have the inventoried waste picked up and disposed.
4. Depending on the response received from authorized transporters and disposal sites, a written schedule should be prepared for shipping of all hazardous wastes. All applicable and current regulations on packaging, labeling, shipping (manifests) will be followed.
5. After all hazardous waste drums have been removed, an independent registered professional engineer and the Plant Manager must execute a certification that the storage site has been closed in accordance with the approved plan. This certification must be submitted to the U.S.E.P.A. Region V Administrator (see #1 above for address).

HAZAR. JS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

1A. CLOSURE PERFORMANCE STANDARD

The closure of the storage facility which is now scheduled to be complete by Aug. 31, 1983 will be accomplished by shipping all waste drums that have been stored for more than ninety days. All drums will be shipped by a licensed Hazardous Waste Hauler to a licensed Hazardous Waste Disposal Facility. All waste which is stored in proper D.O.T. containers will be loaded with the usual caution exercised in handling hazardous waste. Should a drum be ruptured or spill during the loading process all materials shall be cleaned up in the following manner.

- a - Spills on concrete or hard non-absorbant surfaces:
The spill area shall be covered immediately with "Oil sorb" from the Maintenance Department. All materials shall then be scooped and swept up and deposited into D.O.T. approved drums, sealed and labeled. The material shall then be disposed of as Hazardous Waste.
- b - Spills on soil, gravel or other outdoor absorbant surfaces:
The spill area shall be covered immediately with "Oil Sorb" from the Maintenance Department. The area shall be dug up extending a minimum of 1 foot around the spill and 1 foot deep. All material dug up shall be deposited into D.O.T. approved drums, sealed and labeled. The material shall then be disposed of as hazardous waste.

By following the above procedures, there will be no need for further maintenance and controls which eliminates threats to human health and the environment, and avoids post - closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to ground or surface waters or to the atmosphere.

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

II. Maximum inventory of Hazardous Waste in Storage during the life of the Storage Facility.

Waste Type	No. 55 Gallon Drums
Waste Hydraulic Oil & Pit Sludge	43
Waste Paint	93
Waste M.E.K. Flush	334
Waste Methylene Chloride & Bond	90
Waste Methylene Chloride & Ren	<u>178</u>
Total Drums	738 *

*Inventory In September, 1982

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

III. Inventory Removal, Disposal and Decontamination of Equipment:

The hazardous waste storage facility at Centralia is for 55 gallon drums only. Therefore if a spill occurs it will be immediately evident and require immediate attention as described in Section 1A of this closure plan. Labor used in Decontamination, should it become necessary, will be provided by Rockwell Personnel. Tools needed for decontamination will be normal hand tools used at our plant. They will be typically shovels, scrapers, oil - sorb (an absorbant material, and brooms). If the spill should be flammable material, the tools shall be non-sparking special tools. After the spill has been cleaned up the tools shall be wiped down with clean rags. The rags will then be disposed of as hazardous waste. When soil, gravel or other absorbant substance is to be removed a hole will be dug a minimum of one foot, in all directions, larger than the spill. The hole shall be a minimum of one foot deep. All soil removed shall be placed in D.O.T. approved drums and disposed of as hazardous waste. Decontamination of soil and tools shall be determined to be complete upon the visual inspection of Rockwell's Safety and Security Manager.

All material will be shipped by truck approximately 300 miles to a secure landfill. Reclaimable M.E.K. will be shipped by truck approximately 100 miles to a licensed treatment facility.

The following Illinois E.P.A disposal permits are current and usable. 821749, 822030, 822031, 822032, 822212 and 991148.

The following hazardous wastes have been analyzed and applications for permits have been submitted.

- 1 - Waste obsolete and outdated Sherwin Williams and Siebert Oxidermo Paint.
- 2 - Waste obsolete and outdated 3-M Rubber adhesive.
- 3 - Waste General Tire and Sherwin Williams In-mold Coating material with Reclaimable Methylene Chloride.
- 4 - Waste obsolete and outdated General Tire and SHERwin Williams In-mold Coating material.
- 5 - Waste Dilute Hydrochloric Acid
- 6 - Waste Karl Fisher Agent

IIIA. CLOSURE OF CONTAINERS

All containers (55 gallon drums) of Hazardous Waste shall be transported from the outside storage area to the loading dock by forklift trucks. They shall then be loaded on a licensed haulers truck for transport to a secure landfill. All wastes are contained in D.O.T. approved containers (see procedure FY-80-PL. E. 1022 attached) therefore, the forklift operators will not be exposed to the waste. Should a container be damaged in handling and leak the procedure in Sections IA and III of this closure plan shall be followed.

NO: FY 80 PL. E. 1022

Richard Lovett

PREPARED BY:

APPROVED BY:

HAZARDOUS OR SPECIAL WASTE PACKAGING PROCEDURE

- I. In order for Rockwell to be in compliance with EPA, RCRA and DOT regulations, new procedures in packaging and handling of hazardous and special wastes must be followed immediately.
 - A. Packaging of Materials in Removable Head Containers. Removeable head drums should only be used for hazardous waste when closed head drums cannot be used.

SAFETY NOTE: Do not used spark producing tools when packaging waste paint or MEK or when working with empty paint or MEK drums.

1. DRUM INSPECTION

- (a) The drum must be one in which a material was shipped to Rockwell, emptied, and is being refilled for the first time. This is important! Drums that have been re-used are not authorized. The only exceptions to this are in (b) and (c) below.
- (b) 55 gal. steel drums that are new are authorized.
- (c) 55 gal. steel drums that have been reconditioned and tested are authorized.
- (d) Inspect the drum bottom for the embossed lettering DOT-17C STC or DOT-17HSTC. Drums otherwise marked or unmarked are not authorized.
- (e) Inspect the drum for leaks, dents or other deterioration. Remove dents to bring the drum back to its original contour. All other defect are not authorized.
- (f) All marking, including name of previous contents, addressed, and labels must be removed or painted over so that they cannot be read. Including marking on the removable head.

2. FILLING

- (a) After all of the above have been completed the drum may be filled. All drums are to have a minimum of 2" air space to allow for expansion of the waste material.

3. SEALING

- (a) Inspect the lid for straightness and boe. Lids that have been crowned in excess of 3/8" are not authorized. Any visible damage in the seal area is not authorized.

- (b) Fit the lid with a new gasket and carefully align it on top of the drum.
- (c) Inspect the closure ring. Closure rings are to be of 12 ga. steel and be free of twist, dents, or any other defect that could allow the drum to leak.
- (d) Fit the closure ring over the top carefully, bolt lugs down, without disturbing the gasket.
- (e) Fasten the closure ring with a 5/8" minimum dia. bolt and nut.
- (f) Inspect all other plugs and closures for tightness and good gaskets. All plugs and caps must be metal (18 ga. min.)

4. MARKING

- (a) Make up the appropriate hazardous waste label and secure it to the side of the drum approximately 1" from the top.
- (b) Secure a "flammable liquid" label next to the hazardous waste label if required.
- (c) Transport the filled drum to the hazardous waste storage area.

B. Packaging of Material in Non-Removable Head Containers.

SAFETY NOTE: Do not use spark producing tools when packaging Waste paint or MEK or when working with empty paint or MEK drums.

1. DRUM INSPECTION

- (a) Drum inspection is the same as for removable head drums with the exception of item (d). The bottom for non-removable head drums should be embossed with DOT-17E STC. Drums otherwise marked or unmarked are not authorized.

2. FILLING

- (a) Same as for removable head drums.

3. Sealing

- (a) Inspect all plugs for good gaskets and tightness. All plugs must be metal (18 ga. min.)

4. MARKING

- (b) Same as for removable head drums.

IV. SCHEDULE FOR CLOSURE

(Revised 4/13/83)

<u>EVENT</u>	<u>ESTIMATED COMPLETION DATE</u>
1. Submit closure plan to E.P.A. Regional Administrator	Feb. 15, 1983 (Actual Date)
2. Re-submit closure plan *	April 15, 1983
3. Receive permits on all waste Streams from Illinois E.P.A.	May 31, 1983
4. All hazardous waste stored in excess of 90 days removed from storage site.	July 31, 1983
Note: Rockwell International Centralia, Illinois will continue to be a hazardous waste generator and store hazardous waste. However, all hazardous waste will be shipped and disposed of according to all State and Federal E.P.A., R.C.R.A. and D.O.T. regulations within 90 days after they are generated.	
5. Submit certification of closure August 31, 1983 completion to E.P.A Regional Administrator.	August 31, 1983

*Original closure plan rejected by Illinois E.P.A on April 6, 1983. (See letter attached)

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

V. COST ESTIMATE TO CLOSE STORAGE FACILITY

Cost Estimate Date: April 13, 1982

A.	Transportation & Disposal Cost = 738 Drums @ \$49.63/Drum	\$36,626.94
B.	Labor to Load = 3 Man Hours/Truck x 10 Trucks = 30 Man Hours @ \$28.00/Hour	840.00
C.	Salary Cost to Administer Closure 2 Hrs./Shipment x 10 Shipments x \$35.00/Hr.	700.00
D.	Decontamination of Area 100 Man Hours @ \$28.00/Hour	2,800.00*
F.	Professional Engineering Fee to Certify Closure	1,200.00
G.	Contingency Items:	3,000.00
	a. Extra Drums	
	b. Clean-up Materials	
	c. Labels	
	d. Miscellaneous Supplies	
	TOTAL ESTIMATED CLOSURE COST	<u>\$45,166.94</u>

*ONLY IF A SPILL OCCURS

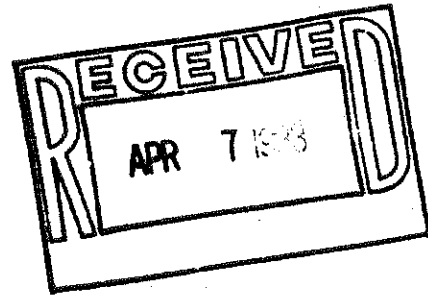


217/782-6762

Refer to: 12180211 -- Marion County
Centralia/Rockwell International
ILD 064626344

April 6, 1983

John J. Sullivan
Plant Manager
Plastics Division
Rockwell International Corporation
4002 Industrial Park
Route 5, Box 151
Centralia, Illinois 62801



Dear Mr. Sullivan:

The closure plan prepared by Richard Lovett, Project Engineer, dated May 10, 1981, and submitted by Rockwell International on February 15, 1983 and received by the Illinois EPA on February 18, 1983 has been reviewed.

Due to the attached deficiencies, the plan is rejected.

Following the procedures in Section 725.212(d) of the Interim Standards of the Illinois Admin. Code, the owner or operator of Rockwell International Corporation must modify the original closure plan or submit a new plan for approval within 30 days. The EPA Director will approve or modify this plan in writing within 60 days. If the Director modifies the plan, this modified plan will become the approved closure plan. The Director's decision will assure that the approved closure plan is consistent with Interim Standards. A copy of the modified plan will be mailed to the owner or operator.

Should you have any questions regarding this, please contact Pat Murphy at 217/782-9798.

Very truly yours,

Rama K. Chaturvedi, P.E., Manager
RCRA Unit
Permit Section
Division of Land Pollution Control

RKC:PMM:rd6776C/15

Attachment

cc: Rockford Region



List of Deficiencies

1. Closure Performance Standard (40 CFR Section 264.111) (35 Ill. Admin. Code 725.211)

Describe how the facility will be closed in a manner that minimizes the need for further maintenance and controls, minimizes, or eliminates threats to human health and the environment; and avoids post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to ground or surface waters or to the atmosphere.

2. Maximum Waste Inventory (40 CFR Section 264.112(a)(2)) (35 Ill. Admin. Code 725.212(a)(2))

The maximum inventory of wastes in storage at any time during the life of the facility must be provided. The closure cost estimate must be based on that maximum inventory. Indicate on the Closure Plan that these are estimates of maximum inventory or provide this information and revise the closure cost estimate.

3. Inventory Removal, Disposal, or Decontamination of Equipment (40 CFR Section 264.112(a)(3)) (35 Ill. Admin. Code 725.21(a)(3))

The following statement:

"There will be no decontamination of equipment involved in the closure of the facility unless a drum is ruptured or leaking."

is not acceptable. Contamination from current events, as well as past events, could contaminate the equipment used for closure.

Describe the steps needed to decontaminate facility equipment during final closure (should decontamination become necessary), the labor force you intend to use to perform decontamination (in-house or outside contractor), and your criteria for determining contamination. Name each piece of equipment and/or structures including equipment used to remove contaminated material, and procedures for cleaning (e.g., steam-cleaning, hydroblasting). Describe the amounts of contaminated soil to be disposed of on and off the site, and describe the criteria used to determine the amount of contaminated soil. Describe the method for processing, treating, or disposing of residues from decontamination (including decontaminant solutions, wastewater, and liquid wastes). Describe the testing program to be used to determine if decontamination has been effective for each piece of equipment and/or structure and surrounding soils (e.g., laboratory procedures, kits, mechanical, electrical, or visual methods). Describe the method of transport to the disposal site (e.g., truck, rail, water), the distance of transport to the disposal site, and the final disposal method (e.g., facility type such as a secure landfill). Indicate that all applicable disposal permits are current and usable.



4. Closure of Containers (40 CFR Section 264.178)

Describe in detail how, at closure, all hazardous wastes and hazardous waste residues will be removed from the container storage area, and how containers and the containment system will be removed or decontaminated. Describe safety precautions and procedures to protect the labor force during the operation. Show how the effectiveness of decontamination will be determined. Also describe the fate of all removed hazardous waste and waste residues and how containers, containment linings, contaminated solids, and decontamination washes will be handled and disposed of.

5. Schedule for Closure (40 CFR Section 264.112(a)(4)) (30 Ill. Admin. Code 725.212(a)(4))

Provide an estimate of the expected date of closure. The date provided, May 19, 2001, does not agree with the information in the cover letter from John J. Sullivan to Bill Miner. The estimated date of closure may be set as the date of approval of the closure plans or a certain number of days after the approval, etc. The closure schedule must include the total time required to close the facility and a milestone schedule depicting the time required for intervening closure activities. This will allow tracking of the progress of closure. Include provisions in the plan for scheduling several periodic inspections during the closure period.

The milestone schedule should show that all hazardous wastes will be treated, removed from the site, or disposed of on the site within 90 days of receipt of the final volume of waste and that all closure activities will be completed within 180 days from receipt of the final volume of waste.

HAZARDOUS WASTE STORAGE SITE CLOSURE PLAN
ROCKWELL INTERNATIONAL - CENTRALIA, ILLINOIS

VI. Special Instructions

- A. This plan must be kept on file at the plant at all times.
- B. This plan must be amended within 60 days after any change is made in waste management operations that affect the terms of the closure plan.
- C. This plan must be furnished to EPA upon request and made available for on-site inspections.
- D. This plan must be submitted within 15 days to the Regional Administrator if our facility has its interim status terminated or an administrative or judicial order directing that we cease operation is received.
- E. The closure cost estimate contained in this plan must be adjusted for inflation annually beginning May 19, 1982.

5HW-12

JAN 10 1984

Mr. Rama Chaturvedi
Permit Section, DLPC
Illinois EPA
2200 Churchill Road
Springfield, IL 62706

Re: Rockwell International
ILD 064626344
Closure Certification

Dear Mr. Chaturvedi:

Enclosed is the closure certification for Rockwell International in
Centralia. The certificate was sent to U.S. EPA in error.

Sincerely,

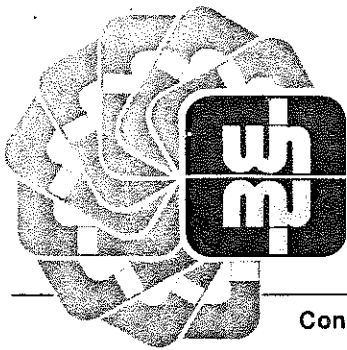
Robert L. Stone
State Implementation Officer

Enclosure

cc: William Radlinski, IEPA

5HW:R.STONE:ns:1/9/84

INITIALS	REPIST NS 1/9/84	AUTHOR RJS 1-10-84	STU #1 CHIEF RJS 1/10/84	STU #2 CHIEF [Signature]	STU #3 CHIEF [Signature]	TPS CHIEF [Signature]	WMB CHIEF [Signature]	W.C. DIRECTOR [Signature]
DATE								



**watwood
and
heavener,
inc.**

James E. Watwood, President
Robert F. Heavener, Vice President
Darlene Pettygrove, Secretary

Consulting Engineers • Architects

November 21, 1983

U. S. Environmental Protection Agency
Regional Administrator
Region V
230 South Dearborn Street
Chicago, IL 60604

Re: Rockwell International
Centralia, Illinois
Hazardous Waste Storage Site Closure
USEPA I.D. No. ILD064626344 *PA, G, TSD*
W&H Job No. 831480

Gentlemen:

On November 21, 1983, I visited the hazardous waste storage site at the Rockwell International plant in Centralia, Illinois; Rockwell's closure plan (amended date, June 30, 1983) was reviewed following this inspection. In accordance with the requirements of 40 CFR, Subpart G, 265.115, I, hereby, certify that the Rockwell hazardous waste storage site has been closed in conformance with its closure plan.

Very truly yours,

WATWOOD AND HEAVENER, INC.

William D. Rose, P. E.
(Illinois P.E. No. 62-33102)

WDR/dp

Rockwell co-certification:

(signature) *11/21/83*
(Date)

John J. Sullivan, Plant Manager
(Name and Title)

11/30/83

RECEIVED
NOV 30 1983

**WASTE MANAGEMENT
BRANCH**

CERTIFICATE

I, ARNOLD W. CANFIELD, certify that I am Assistant Secretary of Rockwell International Corporation, a Delaware corporation, and further certify that:

1. John J. Sullivan is a duly appointed and authorized Plant Manager of the Plastics Division, Automotive Operations, Rockwell International Corporation, Centralia, Illinois, and as such, is fully authorized to execute and deliver on behalf of the corporation agreements and permit applications in the ordinary course of business constituting legally binding obligations of the corporation; and

2. John J. Sullivan as Plant Manager of the Plastics Division at Centralia, Illinois, has duly executed and delivered on behalf of the corporation the Operating Permit Applications to the State of Illinois, Environmental Protection Agency, Division of Air Pollution Control and is authorized, within the approval limits set forth in the Policy and Procedure of Rockwell International Corporation, to cause or to allow the construction, modification and operation of the equipment to be covered by the permit.

3. The foregoing is hereby certified to be in full force and effect as of the date hereof.

[CORPORATE SEAL]


Assistant Secretary

Dated: May 21, 1979

Chassis Components Division
Rockwell International Corporation
Plastic Products Businesses
4002 Industrial Park
Route 5, Box 151
Centralia, Illinois 62801



Rockwell
International

CERTIFIED
P03 5740222
MAIL

U.S. Environmental Protection Agency
Regional Administrator
Region V
230 South Dearborn Street
Chicago, IL 60604

PA

5Hw-13

